



April 10, 2025

**VIA ELECTRONIC CASE FILING**

Honorable Hector Gonzalez  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Adnan Sheikh v. The Port Authority of New York and New Jersey, et al.  
Civil Action No.: 1:24-cv-06309-RML**

Dear Judge Gonzalez:

The parties jointly submit this status report update and an extension request for fact discovery. This is the parties' second request for a discovery extension.

To date, the depositions of all named parties including plaintiff and the six individually named Port Authority Police officers have been held. Plaintiff's deposition was held on February 27, 2025. On March 17, 2025 upon receipt of the deposition transcript, defendants served post-deposition demands seeking HIPAA and other authorizations to obtain family court records; criminal court records; and employment records/W2 documentation. Plaintiff has not yet provided a response to these demands. Once plaintiff responds, these authorizations will then need to be processed. Despite a letter request with a HIPAA authorization sent in January 2025 to plaintiff's therapist Ms. Regina McGuire for the relevant records of plaintiff's treatment and multiple follow-ups thereafter, the provider has still not sent the requested records to defense counsel.

In addition, the parties are collaboratively working together to complete the Rule 30(b)(6) deposition requested by plaintiff. Plaintiff's independent medical examination has also been scheduled at the end of the month. Based on the plaintiff's deposition testimony, defendants' also intend to subpoena plaintiff's wife, Sadia Sheikh, who is the individual that called 911 during her interaction with plaintiff while at the airport. Due to her direct involvement speaking with both plaintiff and the police on scene about the allegations that led to plaintiff's arrest, she is a relevant fact witness. Plaintiff also intends to depose an additional Port Authority Police Officer who was present at the scene of the arrest.

Despite the parties diligently working together to complete all fact discovery and depositions, these matters outlined above still remain outstanding. Defense counsel will also be conducting a pre-scheduled jury trial in New York Supreme Court, Queens County from April 28 to May 5. Per the Court's prior order on February 21, 2025, the fact discovery end date is April 11, 2025 and the expert discovery deadline is June 11, 2025. The parties are requesting a fact discovery extension to May 23, 2025 and expert discovery to July 11, 2025.



Respectfully submitted,

*Christopher Valletta*

---

Christopher J. Valletta, Esq.  
(212) 435-3493

cc: Pablo A. Fernández, Esq.  
Attorneys for Plaintiff  
(via ECF)